

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

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vs.

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Criminal No.: CCB-16-0597

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MONTANA BARRONETTE

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CONSENT MOTION TO ENLARGE TIME FOR FILING PRE-TRIAL MOTIONS

Defendant, Montana Barronette, by his attorney, Alan R. L. Bussard, moves that this Honorable Court enlarge the time for filing pre-trial motions in this matter, and in support states as follows:

1. In, 2016, undersigned counsel was appointed to represent the defendant in the above captioned matter.

2. Initially, Mr. Barronette was charged with Conspiracy to Distribute and Possess with the Intent to Distribute Controlled Substances and related charges

3. On or about June 29, 2017, additional charges of Conspiracy to Commit Racketeering and Violent Crimes in Aid of Racketeering were placed by way of a Superseding Indictment. As a result, if convicted, Mr. Barronette faces a potential death sentence.

4. On December 8, 2017, the Court set March 2, 2018 as the deadline on which all non-capital pre-trial defense motions were to be filed.

5. Pursuant to the discovery agreement with the government, voluminous materials, including materials related to eight (8) separate wire interceptions and at least seven (7) homicide

investigations, plus associated search and seizure and tracking warrant materials, reports of investigation (ROIs) and other materials, have been produced.

6. Undersigned counsel represented a defendant in a 9 week trial beginning in November, 2017 and continuing until January 26, 2018. Thereafter, counsel further represented a defendant in a 4 days trial which ended on February 26, 2018. Presently, counsel is preparing to represent a defendant in a 2 week trial beginning on March 12, 2018.

7. Given the time restraints cause by the two previous trials and the preparation for the upcoming trial, it is likely counsel will be unable to adequately prepare the necessary motions.

8. A brief enlargement of time is requested to permit counsel to review discovery, research possible issues and prepare motions.

9. Undersigned counsel has confirmed that the government, per Christopher Romano, has no objection to the request made herein.

10. The defense suggests that March 30, 2018 be set. It is believed that enlarging the deadline will not hamper the government's ability to properly respond in a time manner, prior to the May 4, 2018 Motions hearing. Assistant United States Attorney, Christopher Romano, is likewise in the midst of back to back trials, including the above referenced 2 week trial commencing on March 12, 2018.

WHEREFORE, the defendant, Montana Barronette, respectfully requests this Honorable Court extend the time for filing of non-capital, pre-trial motions until March 30, 2018.

Respectfully submitted,

_____/s/_____
Alan R. L. Bussard
101 E. Chesapeake Avenue, Ste. 200
Towson, Maryland 21286
410-821-1155

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 28th day of February, 2018, a copy of the foregoing Consent Motion to Enlarge Time for Filing Pretrial Motions was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Christopher Romano, Esquire
Office of the U.S. Attorney
36 S Charles Street, 4th Floor
Baltimore, Maryland 21201.

_____/s/_____
Alan R. L. Bussard